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January 19, 2024

VIA ECF

Hon. Valerie Figueredo
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1660
New York, New York 10007
FigueredoNYSDChambers@nysd.uscourts.gov

Re: **Wade Mullen v. Bodum USA, Inc.**, Case No. 1:23-cv-01166-AT-VF
Consent Motion to Adjourn January 24, 2024, Pre-Settlement Conference

Dear Judge Figueredo:

I was recently retained by Defendant Bodum USA, Inc. ("Bodum") to represent it in connection with the above lawsuit. A Notice of Substitution was filed on January 17, 2024 (ECF No. 33), but has yet to be entered by the Court.

On December 14, 2023, Judge Torres entered an Order referring this case to your Honor for purposes of settlement (ECF No. 28). The parties were scheduled to appear on January 16, 2024, for a pre-settlement conference (ECF No. 29). Counsel for Bodum did not appear and the Court reset the conference for January 24, 2024 (ECF No. 32).

Regrettably, I am unavailable on January 24th due to a product inspection in an unrelated case in the State of California. We respectfully request that the Court adjourn the pre-settlement conference to a later date to allow undersigned counsel to appear. This is Bodum's first request for adjournment of the pre-settlement conference.

Plaintiff consents to this request.

Very truly yours,

Thompson Coburn LLP

A handwritten signature in black ink, appearing to read 'J. Wheeler'.

By
Jason A. Wheeler

MEMO ENDORSED

A handwritten signature in black ink, appearing to read 'Valerie Figueredo'.

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

DATED: January 23, 2024

The pre-settlement conference in this matter is hereby rescheduled for

Thursday, February 1, 2024 at 10:00

a.m. The dial-in information remains the same. The Clerk of Court is directed to terminate the motion at ECF No. 34.

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cc: Alex Kress (akress@johnsonbecker.com)
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